

1 Michael L. Rodenbaugh (SBN 179059)  
2 Jonathan Frost (SBN 273189)  
3 RODENBAUGH LAW  
4 548 Market Street, Box 55819  
5 San Francisco, CA 94104  
6 Phone: (415) 738-8087  
7 Email: [mike@rodenbaugh.com](mailto:mike@rodenbaugh.com)  
8 [jonathan@rodenbaugh.com](mailto:jonathan@rodenbaugh.com)  
9 [docket@rodenbaugh.com](mailto:docket@rodenbaugh.com)

10 Attorneys for Defendant sued as  
11 GEORGE DIKIAN

12 **IN THE UNITED STATES DISTRICT COURT**  
13 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

14 VPN.COM LLC,

15 Plaintiff(s),

16 v.

17 GEORGE DIKIAN, et al.,

18 Defendant(s).  
19  
20

Case No.: 2:22-cv-04453-AB-MAR

**DECLARATION OF MICHAEL  
RODENBAUGH IN SUPPORT OF  
PLAINTIFF'S APPLICATION TO FILE  
UNDER SEAL**

Judge: Honorable Andre Birotte Jr.  
Date: October 2, 2023  
Courtroom: 7B

21 I, Michael L. Rodenbaugh, do hereby declare as follows:

22 1. I am the owner and managing attorney at Rodenbaugh Law, lead counsel of record  
23 for Defendant sued as George Dikian in this matter. I am licensed to practice in the State of  
24 California, and I am admitted to practice before the U.S. District Court for the Central District of  
25 California.

26 2. I am familiar with the facts set forth herein, and, if called as a witness, I could and  
27 would testify competently to those facts under oath. I submit this declaration in support of Plaintiff  
28 VPN.COM LLC's Application for Leave to file portions of Plaintiff's Motion for Alternative

1 Service; Declaration of Michael D. Cilento in Support of the Motion for Alternative Service;  
2 Exhibit A to the Cilento Declaration in Support of the Motion for Alternative Service; and Exhibit B  
3 to the Cilento Declaration in Support of the Motion for Alternative Service (collectively called  
4 “Documents” under seal), pursuant to Local Rule 7-11 and 79.

5 3. The Plaintiff’s motion included citations to portions of the Defendant sued as George  
6 Dikian’s Declaration. The cited portions of the declaration have been designated as confidential and  
7 already were previously filed under seal in this Court. *See* ECF 76. These portions of the  
8 Defendant’s declaration ought to remain redacted and filed under seal in the Plaintiff’s Motion for  
9 Alternative Service and attached filings, pursuant to the good cause shown supporting the Court’s  
10 Order Granting Plaintiff’s Application for leave to File Under Seal, granted September 29, 2023.

11 4. The Parties have conferred on numerous occasions and in depth as to the portions of  
12 the Documents that are designated as confidential and are to be filed under seal, so as to eliminate  
13 any excessive or unnecessary redactions of the record.

14 5. It is Defendant George Dikian’s position that these citations to the Defendant’s  
15 Deposition ought to remain confidential and under seal due to the highly sensitive nature of the  
16 information.

17 6. The Defendant maintains that any public disclosure of the aforementioned  
18 information would contravene the Defendant’s long-established effort to protect his family and his  
19 financial security practices pseudonymously. Competitors, potential illegal hackers, and other ill-  
20 wishing parties would gain an unfair and illegitimate insight into Defendant George Dikian’s  
21 personal family life and business security information location, accessibility, changes, records, and  
22 layers of security thereupon.

23 7. The name, location, home address of the Defendant’s son, a non-party, is confidential  
24 information that any reasonable person would likely consider to be private and preferred to be kept  
25 as confidential rather than it be publicly disclosed in connection with Plaintiff’s ill-advised and  
26 misguided fraud complaint.

27 //

28 //

1 I declare under penalty of perjury of the laws of the United States of America that the  
2 foregoing is true and correct to the best of my knowledge and belief.

3 Executed on October 2, 2023.

4 By: /s/ Mike Rodenbaugh

5 Mike L. Rodenbaugh (SBN 179059)

6 *Attorneys for Defendant*  
7 *Sued as George Dikian*

8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
United States District Court  
Central District of California